

From: [Benbow, Gene](#)
To: [Wasem, Russell](#); [Fitz, Nancy](#); [Koch, Erin](#)
Cc: [Baris, Reuben](#); [Jacobs, William](#); [Gaines, Jennifer](#)
Subject: RE: Question about using service containers for rodenticides
Date: Friday, September 27, 2013 11:34:42 AM

Rusty,

This exact question came up in the Label Review Committee a few weeks ago for an insecticide. Basically the guy was using a “service tank” on the back of his pickup and said there was no way he could possibly return to the original container after making some of the longer distance “runs” he needed to make during his work day. I don’t recall the *exact* response, but it was essentially that we had not intended to prevent PCOs from doing their job due to the “store only in original container” language.

I’m going to copy Erin Koch on this message since I’m sure she recalls our response –

Thanks,

Gene Benbow

Biologist, EPA

Insecticides-Rodenticides Branch

Registration Division

<http://epa.gov/pesticides/>

703-347-0235

From: Wasem, Russell
Sent: Friday, September 27, 2013 11:26 AM
To: Fitz, Nancy
Cc: Baris, Reuben; Jacobs, William; Benbow, Gene; Gaines, Jennifer
Subject: RE: Question about using service containers for rodenticides

Hello Nancy,

I have not seen this question before, but would tend to think the draft answer contradicts label requirements. I will defer to the RD team (cc’ed) for that question as they are more familiar with this type of label language.

Rusty

From: Fitz, Nancy

Sent: Friday, September 27, 2013 10:49 AM

To: Wasem, Russell

Subject: Question about using service containers for rodenticides

Hi Rusty,

I was wondering if you could take a quick look at the following question and a draft answer that I prepared after discussing this with Jeanne Kasai (OPP), David Stangel (OECA) and Brian Dyer (OECA). Have you run across this question before and, if so, is the answer we came up with the same as what you have heard/said previously? If not, please point me in the right direction!

Situation: A PCO called me earlier this week. He wants to transfer rodenticides from a 16-pound pail to smaller pails (e.g., 4-pound containers) for taking the rodenticide to the sites where they would be applied. We discussed what is/is not a service container and I provided him with some Q&As and other information about service containers.

Question: A lot of rodenticide product labels say "Store only in original containers." Does this prevent them from using service containers?

Draft Answer: I discussed this with several colleagues from our enforcement office. We are not aware of any previous policies or Q&As on this question. The conclusion from our discussion was that the statement "Store only in original containers." does not prevent the use of service containers – such as the 4-pound container – for transporting the product to the use site where the pesticide is applied. However, at the end of the day, the unused product in the service container should be returned to the original container for storage.

Nancy Fitz

Office of Pesticide Programs

U.S. Environmental Protection Agency

phone: 703-305-7385

email: fitz.nancy@epa.gov

web site: <http://www.epa.gov/pesticides/regulating/containers.htm>